



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 31, 2018

By Email and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Brittany N. Benavidez, Esq.
Samantha Springer, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Consistent with the Court's directive at the June 20, 2018 conference and the Court's August 2, 2018 Order with respect to the above-referenced matter, the government is providing (and has provided earlier this week) English translations of certain Chinese-language materials previously provided, which have been Bates-stamped TR001390-TR002257. The government renews its request for reciprocal discovery from the defendant.

A chart is also attached for counsel's reference in identifying the source document of each included translation. Where the Bates number of the translated document includes multiple documents (or originals that are otherwise not in the same format as the translated document), the originals are included to facilitate the comparison. Please note that

when an original document has duplicates, not all duplicates are identified, but the translation applies to all duplicate versions of the original document.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Nicholas J. Moscow
Alexander A. Solomon
Douglas M. Pravda
Ian C. Richardson
Nicholas J. Moscow
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (TR001390-TR002257)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)